CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—LOS ANGELES REGION

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June 21, 1989

Mr. Charles M. Miller C. M. Miller Enterprises 20415 Prestino Way Walnut, CA 91789

SOIL REMEDIATION - MONADNOCK FACILITY, ARENTH, CITY OF INDUSTRY (FILE NO. 88-057)

Your report, received on May 10, 1989, has been reviewed. It describes the verification program for clean-up and the proposal for backfilling and closing the current excavation. In summary this clean-up to date has consisted of:

- 1. Initial extent of contaminated soil and unconsolidated geologic materials was determined southerly from the main building. Chemicals encountered consisted of: trichloroethene (TCE), tetrachloroethene (PCE), 1,1,1-trichloroethane (1,1,2-TCA), 1,1,2-trichloroethane (1,1,2-TCA).
- 2. In an iterative process 120 yd³ of material were removed from the site, creating an open excavation having a maximum depth of approximately 10 feet.
- 3. Further investigation was made to determine the lateral and vertical extent of any remaining contaminant associated with the excavation. Nine (9) deep borings were made to complete the perimeter control of the excavation.
- 4. Verification of removal of contamination to the surrogate clean-up level (200 ug/kg PCE) has been made by some 34 shallow sidewall and bottom borings. A field laboratory, Department of Health Service (DHS) certified, was utilized.
- 5. As a result of the verification program an additional 70 yd of unconsolidated materials were removed. The excavation was deepened to a maximum depth of approximately 18 feet.

Based on the analytical results presented in this and preceding

report, staff has no objection to the closure of the excavation provided the following comments are incorporated into the closure procedures:

- 1. The report indicates that the latest 70 yd³ of removed material has been stockpiled at the site. This material was required, in a previous review letter, to be containerized. This must be accomplished before initiation of any backfilling operations.
- 2. Uncontaminated cuttings from any of the nine borings, currently containerized may be utilized in the final lift of the backfill, provided that analyses of sufficient samples from each of the borings are "no-detect" (ND) for site contaminants. Excavated materials or cuttings affected by such contaminants should be disposed of offsite.
- 3. The cleanliness of the large mound of unconsolidated material stockpiled at the south east corner of the site must be established. This can only be done by systematic sampling and analysis. Although it has been frequently stated that these materials derived from off-site grading, some grading was required for the entrance drive to Monadock. Surface runoff, described in detail in various affidavits as producing a "swamp" may have affected the area(s) graded. The anomalous VOC content of MW-3, downgradient from the spoils mound, could be the result of contaminants leaching from the spoils.
- 4. Compaction of approved fill materials must meet county requirements for a certified fill to prevent settlement of the fill which might result in cracking and depression of the impermeable cap. This could lead to local infiltration of surface runoff. County Building Department signoff(s) will be required. This means, for example: thinner lifts, 95% compaction and fill tests for each lift, will be needed.
- 5. Construction of a certified fill with clean backfill materials and surface cover with reinforced concrete paving will be accepted in lieu of a thick clay cap and concrete cover. The degree of verification performed, the additional removals to below detection limits and the adherence to low clean-up levels creates a situation at this area of the site where relaxation of strict RCRA closure is appropriate.

- 6. Provide to staff of this Regional Board the following documentation prior to initiation of backfilling:
 - a) County approvals/permits for fill construction.
 - b) Cap design with details of visqueen underlay and reinforcement.
 - c) Representative analyses of spoils material proposed for backfill.
 - d) Waste disposal manifests for the latest 70 yd³ of excavated material and for any appropriate containerized cuttings.
- 7. Provide a report which describes implementation of closure plans.

The proposed closure is approved providing the foregoing are incorporated into the design and construction of backfill and cap. The required materials are due to this Regional Board by July 12, 1989. A report describing implementation of closure is required by August 12, 1989. If you have any questions please call Philip Chandler at (213) 620-6091.

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